

Wisconsin Department of Regulation & Licensing

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PHARMACY EXAMINING BOARD

PRESCRIPTION DEVICE OR DRUG DISTRIBUTOR SELF-INSPECTION INFORMATIONAL SHEET

The Board no longer requires the Department of Regulation and Licensing to send inspectors to conduct on-site inspections prior to licensure.

In lieu of the above, the Board requires the person responsible for distribution to complete the "Prescription Device or Drug Distributor Self-Inspection Report" (Form #2692 for Prescription Device Distributor and Form #2406 for Prescription Drug Distributor). Please complete each line indicating compliance, by initialing each item. Sign and notarize the affidavit. If the facility is in non-compliance with any portions of the "Prescription Device or Drug Distributor Self-Inspection Report" please indicate why the facility is in non-compliance and when the facility will be in compliance. Return the entire "Prescription Device or Drug Distributor Self-Inspection Report" to the Board office when completed. Please make a copy for your files.

After the "Prescription Device or Drug Distributor Self-Inspection Report" has been reviewed and is found to be in order, a license number will be issued if all other requirements have been satisfied.

If the facility is located within the State of Wisconsin, the Department on behalf of the Board will conduct an unannounced audit of the facility location within one year after the date the license was issued to verify that the facility is in compliance with the "Prescription Device or Drug Distributor Self-Inspection Report" as well as the "Wisconsin Statutes and Administrative Code Relating to the Practice of a Prescription Device or Drug Distributor."

NOTICE TO CREDENTIAL HOLDERS CONDUCTING SELF-INSPECTIONS

The Division of Enforcement in the Department of Regulation and Licensing conducts a follow-up inspection to the self-inspection done by Prescription Device or Drug Distributors prior to their opening for business.

Below is a list of the most frequently occurring problems we found during our follow-up inspections. The reference is to the Pharmacy Board Rule or Statute. This list is being provided to assist new businesses in conducting their self-inspections.

Prescription Drug or Device Distributors:

- Prescription labels – Not having the correct address of the facility or using the name of the previous owners.
- Recordkeeping - Manufacturers did not have adequate records to document their stock from receipt to disposition (Phar 13.11(4)).
- Alarm systems – All facilities must have a functioning alarm system at all times to detect entry after hours. Some facilities were found to have opened without an alarm system in place or the alarm system was not working at various times (Phar 13.10(4)).
- Display of license – License is not displayed in a conspicuous place (Wis. Stats. 450.09(5)).
- Written policies and procedures-the manufacturer frequently assumes that the state follows the same requirements as the federal government. The federal government is responsible for overseeing the quality of the prescription drugs and/or devices; and how the employer treats their employees. The state's concern is that policies and procedures reflect how the distributor handles the security and operation of the facility in relationship to the prescription drugs and/or devices. Numerous policy and procedural manuals were found to be inadequate, especially in covering emergency procedures (Phar 13.15).

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PROCEDURE FOR REPORTING THEFT OR LOSS OF CONTROLLED SUBSTANCES

The Managing Pharmacist is responsible for reporting any theft or loss of controlled substances to the U.S. Department of Justice, DEA Kluczynski Building, Ste. 1200, 230 S. Dearborn Street, Chicago, IL 60604 (312-353-1236, or 1-800-478-7642 toll free 24 hours), and to the Pharmacy Examining Board, P.O. Box 8935, Madison, WI 53708-8935, (608-266-2112). Report the theft or loss on DEA Form #106 (Report of Theft or Loss of Controlled Substances), obtainable from DEA at www.deadiversion.usdoj.gov. Make four copies. Send the original and one copy to the DEA office, one copy to the Pharmacy Examining Board, and one copy should be kept with the biennial inventory in the pharmacy.

All thefts or losses must also be reported to the local law enforcement officials. Send a copy of the police report, when available to the Pharmacy Examining Board.

PROCEDURE FOR DESTROYING CONTROLLED SUBSTANCES

Contact the US Department of Justice, 1000 N. Water Street, Room 1010, Milwaukee, WI 53202 or www.deadiversion.usdoj.gov for the proper forms.

WISCONSIN STATUTES AND ADMINISTRATIVE CODE

Please view the Department website at <http://drl.wi.gov/boards>.

APPROVED PRESCRIPTION DRUG PRODUCTS AND CODE OF FEDERAL REGULATIONS

These publications are obtainable from the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20401.